

UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America

v.

Alonso Lopez-Dominguez

Case No.

1:23-mj-0087

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 17, 2023 in the county of Cumberland in the
Middle District of Pennsylvania, the defendant(s) violated:

Code Section

21 U.S.C. 841 (a)(1)

21 U.S.C. 846

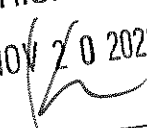
Offense Description

Possession with Intent to Distribute Cocaine Hydrochloride

Conspiracy to Posses with the Intent to Distribute Cocaine Hydrochloride

This criminal complaint is based on these facts:

See the attached continuation pages.

FILED
 HARRISBURG, PA
 NOV 20 2023
 PER 
 DEPUTY CLERK

☒ Continued on the attached sheet.*Complainant's signature*

Ryan Byrnes, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: NOV. 20, 2023*Judge's signature*City and state: Harrisburg, Pennsylvania

Daryl F. Bloom, U.S. Magistrate Judge

Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

I, Ryan Byrnes, being first duly sworn, hereby depose and state as follows:

I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516, Title 18, United States Code. I have been employed by the Drug Enforcement Administration as a Special Agent since January 2022. I attended the DEA academy in Quantico, Virginia from February 2022 through June 2022. During my period at the academy, I was trained and tested on roles and responsibilities of a Special Agent and the investigation of federal drug crimes to include, drug identification, criminal law and courtroom procedure, surveillance, evidence handling, search warrant procedure, report writing, training in surveillance, counter-surveillance, and the smuggling of drugs. Upon graduation from the DEA academy, I was assigned to the Harrisburg, PA Resident Office where I have participated in numerous investigations of unlawful drug distribution and have conducted or participated in surveillances, the execution of search warrants and the debriefing of informants and

cooperating witnesses. I have served as a monitor, a member of the surveillance team and have listened to or reviewed intercepted phone calls between individuals identified as suspected narcotics traffickers.

The information contained in this affidavit was gleaned from my own personal participation in the investigation or provided to me by other members of law enforcement and/or Special Agents of the DEA.

On November 17, 2023, the DEA Harrisburg Resident Office in conjunction with Pennsylvania State Police assisted the DEA Rochester Resident Office in an operation where two Target Subjects were scheduled to deliver approximately 10 kilograms of cocaine on behalf of a Mexico-based Drug Trafficking Organization (DTO) to a DEA Confidential Source (CS). A member of the DTO stated to the DEA CS that the 10 kilograms were to be delivered by truck drivers into the Middle District of Pennsylvania, specifically the delivery was to be at a Flying J gas station located at 1501 Harrisburg Pike, Carlisle, PA 17013. The individuals the DTO sent to conduct the delivery were ultimately identified as Brayan Rosario LOPEZ-DOMINGUEZ and Alonso LOPEZ-DOMINGUEZ. Brayan LOPEZ-DOMINGUEZ acted as counter

surveillance while Alonso LOPEZ-DOMINGUEZ completed the arranged transaction with the CS.

Investigators observed Alonso LOPEZ-DOMINGUEZ enter the CS's vehicle. The CS then drove over to the truck area of the parking lot. Alonso LOPEZ-DOMINGUEZ and the CS walked over to a white single tractor with no trailer at which time the cocaine was delivered to the CS. Investigators observed the CS carrying a package on his/her shoulder that contained approximately 10 kilograms of cocaine. The CS then entered his/her vehicle and left the Flying J gas station.

Investigators observed the tractor trailer both Brayan LOPEZ-DOMINGUEZ and Alonso LOPEZ-DOMINGUEZ arrived in, leave the Flying J gas station.

After the CS left the Flying J gas station Brayan LOPEZ-DOMINGUEZ and Alonso LOPEZ-DOMINGUEZ identified Law Enforcement in the area and discarded portions of their clothing, a cellular phone which was used in facilitating the transaction as well as portions of United States currency provided by the CS.

The Pennsylvania State Police then conducted a traffic stop on the tractor trailer on I-81 in Carlisle, PA where a search of the vehicle was completed, no further contraband was located during the search. Both Alonso LOPEZ-DOMINGUEZ and Brayan LOPEZ-DOMINGUEZ were detained and interviewed. Both Alonso LOPEZ-DOMINGUEZ and Brayan LOPEZ-DOMINGUEZ made Post-Miranda statements confessing to their involvement in transporting, possessing and distributing 10 kilograms of cocaine within the Middle District of Pennsylvania.

Your affiant believes that probable cause exists for the warrantless arrest of Brayan LOPEZ-DOMINGUEZ and Alonso LOPEZ-DOMINGUEZ for violations of Title 21 USC 841 (a) (1), Possession with Intent to Distribute Cocaine Hydrochloride, and Title 21 USC 846, Conspiracy to Posses with the Intent to Distribute Cocaine Hydrochloride.